

EXHIBIT E

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2 -----
3 MUTINTA MICHELO, KATHERINE SEAMAN,
4 MARY RE SEAMAN, and SANDRA TABAR,
individually and on behalf of all
others similarly situated,

5 Plaintiffs,

6 vs. 18-CV-7692 (PGG)

7 NATIONAL COLLEGIATE STUDENT LOAN
TRUST 2007-2; NATIONAL COLLEGIATE
8 STUDENT LOAN TRUST 2007-3; TRANSWORLD
SYSTEMS, INC., in its own right and
9 as successor to NCO FINANCIAL SYSTEMS,
INC.; EGS FINANCIAL CARE, INC., formerly
10 known as NCO FINANCIAL SYSTEMS, INC.;
and FORSTER & GARBUS, LLP,

11 Defendants.

12 -----
13 CHRISTINA BIFULCO, FRANCIS BUTRY, and
14 CORI FRAUENHOFER, individually and on
behalf of all others similarly situated,

15 Plaintiffs,

16 vs.

17 NATIONAL COLLEGIATE STUDENT LOAN
TRUST 2004-2; NATIONAL COLLEGIATE
STUDENT LOAN TRUST 2004-4; TRANSWORLD
SYSTEMS, INC., in its own right and
18 as successor to NCO FINANCIAL SYSTEMS,
INC.; EGS FINANCIAL CARE, INC., formerly
19 known as NCO FINANCIAL SYSTEMS, INC.;
and FORSTER & GARBUS, LLP,

20 Defendants.

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24 (Continued on next page)

25 DEPOSITION OF SANDRA TABAR

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

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4 MUTINTA MICHELO, et al.,
5 Plaintiffs,

6 vs. 18-CV-7692 (PGG)

7 NATIONAL COLLEGIATE STUDENT LOAN
8 TRUST 2007-2; et al.,

9 Defendants.
10 -----

11 CHRISTINA BIFULCO, et al.,
12 Plaintiffs,

13 vs.

14 NATIONAL COLLEGIATE STUDENT LOAN
15 TRUST 2004-2; et al.,

16 Defendants.
17 -----

18
19 DEPOSITION OF SANDRA TABAR

20
21 Friday, March 6, 2020

22 9:00 a.m.

23 Reported by:

24 Joan Ferrara, RMR, FCRR

25 Job No. 2020-83322

March 6, 2020

9:00 a.m.

New York, New York

Deposition of SANDRA TABAR, held
at the offices of Locke Lord, LLP, 200
Vesey Street, New York, New York, before
Joan Ferrara, a Registered Merit Reporter,
Federal Certified Realtime Reporter and
Notary Public of the State of New York.

Sandra Tabar - March 6, 2020

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1 S. Tabar

2 A Someplace in Brooklyn.

3 Q Okay.

4 Were you still getting mail at
5 the Undercliff address in March of 2014?

6 A Not anything -- not really.

7 Q Okay.

8 Have you ever seen this letter
9 before?

10 A I have never seen this letter
11 before.

12 MR. HAWKINS: Objection to
13 letter.

14 BY MR. SCHULTZ:

15 Q And you've never gotten this
16 document before?

17 A I never gotten this document
18 before.

19 Q It was never delivered to you or
20 your daughter?

21 A It was not.

22 Q Okay.

23 Attached to this exhibit is a
24 copy of the complaint that was filed in the
25 Bronx Court.

Sandra Tabar - March 6, 2020

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1 S. Tabar

2 Have you ever seen that before?

3 A I have not seen that before.

4 MR. HAWKINS: Jim, are you
5 talking about whether she's seen this
6 copy of the complaint that was filed
7 against her or whether she's aware
8 that there was a complaint filed
9 against her in the Bronx Court?

10 MR. SCHULTZ: If she has problem
11 with the question, she could ask me.

12 BY MR. SCHULTZ:

13 Q So you have not seen the
14 complaint before?

15 A No.

16 Q Okay.

17 Do you still -- does your mother
18 still live at the Undercliff address?

19 A Yes, she does.

20 Q Do you still get mail there from
21 the electric company?

22 A No. The bill is not in my name
23 anymore.

24 Q Okay. So do you get any mail?

25 A So I just -- no, I don't.

Sandra Tabar - March 6, 2020

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1 S. Tabar

2 question.

3 A I went to court --

4 Q I have to ask the question.

5 I understand you went to court,

6 you think you won, I understand that.

7 That's not my question.

8 Here's the problem I have.

9 You're alleging in this lawsuit, as we

10 looked at in paragraph 12, that false

11 affidavits were being submitted.

12 What I want to know from you is

13 what in that affidavit is false.

14 MR. HAWKINS: Okay. Same

15 instruction.

16 BY MR. SCHULTZ:

17 Q And I keep asking you and you're

18 not going to tell me because you said --

19 A I'm not going to answer this

20 question.

21 MR. HAWKINS: On a privilege

22 basis.

23 BY MR. SCHULTZ:

24 Q And what I want to know is

25 regardless of any communications with your